214
-3

ecology and environment, inc.

1776 SOUTH JACKSON STREET, DENVER, COLORADO 80210, TEL. 303-757-4984

International Specialists in the Environment

November 22, 1989

Mr. Peter Mygatt
Public Relations Specialist
USDOE Project Office
P.O. Box 2567
Grand Junction, CO 81502

Subject: Public comments on the Monticello Mill RI/FS Documents Dated September, 1989.

Dear Mr. Mygatt:

In response to the solicitation of public comments on the Monticello RI/FS I wish to offer the comments on: the alternate site selection process; groundwater cleanup design and schedule and selective tailings emplacement.

Selective Emplacement of Tailings.

One of the most important variables in tailings emplacement is to selectively bury the most contaminated materials and overlay them with layers of lesser contaminated materials. At the Monticello site there are sufficiently large volumes of differentially contaminated materials which would allow reduced surface radon emission values, if selective covering and pile emplacement was practiced. With selective emplacement the net pile emission values would be reduced and this would negate the requirement for such thick radon and frost penetration barriers. An analysis on this factor should be included in the final design.

Reduced Schedule for Operable Unit III Groundwater Remediation Program.

The current proposed program of a 13 year groundwater remediation program could be significantly shortened if a reinfiltration design option were included in the design. As the program currently is designed only natural groundwater replenishment will drive the site cleansing process. It is felt a design alternative of reintroducing the treated water, or enhancing this water with chemical additives, could drastically reduce the time cleanup interval. Bench treatment studies and designs should be included in the final design. It is felt this would be a cost effective management control option.

19026

Alternative Disposal Site Analysis.

Contrary to the study findings, and the reports interpretation of the National Contingency Plan, the proposed alternative of purchasing additional land and creating new tailings disposal cell does constitute an off-site disposal plan. The report needs to clearly show that all of the alternative sites institutional and economic constraints treated evenly in the RI/FS alternative analysis process.

The institutional and economic barriers posed by the RI/FS lead the reader to the conclusion that no other alternate disposal facilities could reasonably accept and dispose of the tailings material from permitting and cost efficiency stand points. The fact that these materials come from CERCLA sites does not alter the fact that these are normal uranium mill tailings which can be safely transported and disposed at existing NRC or State permitted uranium mill tailings disposal sites. If there are institutional and permitting constraints to utilizing permitted sites an analysis should have been included indicating how to rectify these constraints.

The economics of remote off-site disposal appear to be high. The DOE should have an extensive tailings transportation and disposal cost database from which to more effectively calculate the ranges of these costs, and to utilize this in the RI/FS cost analysis.

Although the lowest cost option may not be the best environmental option, more realistic costs in comparison to design or location alternatives should be reviewed in making the final decision.

Thank you for allowing our public comment on this important disposal question.

Sincerely,

Stuart Richardson

Stuart Richardson